

## WRIGHT, FINLAY & ZAK, LLP

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*Attorneys for Defendants National Collegiate Master Student Loan Trust I, National Collegiate Student Loan Trust (“NCSLT”) 2003-1, NCSLT 2004-1, NCSLT 2004-2, NCSLT 2005-1, NCSLT 2005-2, NCSLT 2005-3, NCSLT 2006-1, NCSLT 2006-2, NCSLT 2006-3, NCSLT 2006-4, NCSLT 2007-1, NCSLT 2007-2, NCSLT 2007-3, and NCSLT 2007-4*

UNITED STATES DISTRICT COURT

**DISTRICT OF NEVADA**

Richard Klein and Raymond Urias, individually and on behalf of all others similarly situated.

Case No.: 2:22-cv-01392-GMN-BNW

Plaintiffs,

vs.

National Collegiate Student Loan Trust aka  
National Collegiate Master Student Loan Trust  
I, National Collegiate Student Loan Trust 2003-  
1, National Collegiate Student Loan Trust  
2004-1, National Collegiate Student Loan Trust  
2004-2, National Collegiate Student Loan Trust  
2005-1, National Collegiate Student Loan Trust  
2005-2, National Collegiate Student Loan Trust  
2005-3, National Collegiate Student Loan Trust  
2006-1, National Collegiate Student Loan Trust  
2006-2, National Collegiate Student Loan Trust  
2006-3, National Collegiate Student Loan Trust  
2006-4, National Collegiate Student Loan Trust  
2007-1, National Collegiate Student Loan Trust  
2007-2, National Collegiate Student Loan Trust  
2007-3, and National Collegiate Student Loan  
Trust 2007-4

**VERIFIED PETITION FOR  
PERMISSION TO PRACTICE IN THIS  
CASE ONLY BY ATTORNEY NOT  
ADMITTED TO THE BAR OF THIS  
COURT AND DESIGNATION OF  
LOCAL COUNSEL**

FILING FEE IS \$250.00

## Defendants

28 R. James DeRose III, Petitioner, respectfully represents to the Court:

1       1.    That Petitioner is an attorney at law and a member of the law firm of Locke Lord  
 2 LLP with offices at 200 Vesey Street, 20th Floor, New York, NY 10281, (212) 415-8600,  
 3 rderose@lockelord.com.

4       2.    That Petitioner has been retained by Defendants, National Collegiate Master  
 5 Student Loan Trust I, National Collegiate Student Loan Trust (“NCSLT”) 2003-1, NCSLT 2004-  
 6 1, NCSLT 2004-2, NCSLT 2005-1, NCSLT 2005-2, NCSLT 2005-3, NCSLT 2006-1, NCSLT  
 7 2006-2, NCSLT 2006-3, NCSLT 2006-4, NCSLT 2007-1, NCSLT 2007-2, NCSLT 2007-3, and  
 8 NCSLT 2007-4, incorrectly sued as unknown purported entity “NCSLT aka National Collegiate  
 9 Master Student Loan Trust I, NCSLT 2003-1, NCSLT 2004-1, NCSLT 2004-2, NCSLT 2005-1,  
 10 NCSLT 2005-2, NCSLT 2005-3, NCSLT 2006-1, NCSLT 2006-2, NCSLT 2006-3, NCSLT 2006-  
 11 4, NCSLT 2007-1, NCSLT 2007-2, NCSLT 2007-3, and NCSLT 2007-4,” to provide legal  
 12 representation in connection with the above-entitled case now pending before this Court.

13       3.    That since June 7, 2004, Petitioner has been and presently is a member in good  
 14 standing of the bar of the highest Court of the State of New York where Petitioner regularly  
 15 practices law. Petitioner shall attach a certificate from the state bar or from the clerk of the supreme  
 16 court or highest admitting court of each state territory, or insular possession of the United States  
 17 in which applicant has been admitted to practice law certifying the applicant’s membership therein  
 18 is in good standing.

19       4.    That Petitioner was admitted to practice before the following United States District  
 20 Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts  
 21 of other States on the dates indicated for each, and that Petitioner is presently a member in good  
 22 standing of the bars of said Courts.

	Court	Date Admitted	Bar Number
24	Supreme Court of New York	6/7/2004	4241683
25	United States District Court of the Eastern District of New York	5/11/2005	--
26	United States District Court of the Southern District of New York	4/12/2005	--
27	United States District Court of the Western District of Michigan	3/23/2017	--
28	United States Court of Appeals for the Second Circuit	10/12/2016	--

1	United States Court of Appeals for the Sixth Circuit	8/8/2017	--
2	United States Court of Appeals for the Seventh Circuit	10/26/2011	--
3	United States Court of Appeals for the Eighth Circuit	9/14/2018	--
4	United States Court of Appeals for the Ninth Circuit	12/17/2009	--

5. That there have been no disciplinary proceedings instituted against Petitioner, nor  
6. any suspension of any license, certificate or privilege to appear before any judicial, regulatory or  
7. administrative body, or any resignation or termination in order to avoid disciplinary or disbarment  
8. proceedings.

9. 6. That Petitioner has never been denied admission to the State Bar of Nevada.

10. 7. That Petitioner is a not a member of good standing in any Bar Associations.

11. 8. Petitioner has not filed any applications to appear as counsel under Local Rule IA  
12 11-2 (formerly LR IA 10-2) during the past three (3) years.

13. 9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the  
14 State of Nevada with respect to the law of this state governing the conduct of attorneys to the same  
15 extent as a member of the State Bar of Nevada.

16. 10. Petitioner agrees to comply with the standards of professional conduct required of  
17 the members of the bar of this court.

18. 11. Petitioner has disclosed in writing to the client that the applicant is not admitted to  
19 practice in this jurisdiction and that the client has consented to such representation.

20. /./.

21. /./.

22. /./.

23. /./.

24. /./.

25. /./.

26. /./.

27. /./.

28. /./.

1 Petitioner respectfully prays that Petitioner be admitted to practice before this Court FOR  
2 THE PURPOSES OF THIS CASE ONLY.

3   
R. JAMES DEROSE III

4 STATE OF NEW YORK )  
5 COUNTY OF NEW YORK )

6 R. James DeRose III, Petitioner, being first duly sworn, deposes and says: That the foregoing  
7 statements are true.

8   
R. JAMES DEROSE III

9 Subscribed and sworn to before me this

10 8th day of November, 2022.

11   
12 Vienna Messina  
13 Notary Public or Clerk of Court

14 

VIENNA MESSINA NOTARY PUBLIC, STATE OF NEW YORK Registration No. 02ME6431865 Qualified in New York County My Commission Expires <u>5-31-2024</u>
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15 **DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO  
16 THE BAR OF THIS COURT AND CONSENT THERETO.**

17 Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner believes  
18 it to be in the best interests of the clients to designate Ramir M. Hernandez, Attorney at Law, member  
19 of the State of Nevada and previously admitted to practice before the above-entitled Court as associate  
20 resident counsel in this action. The address and email address of said designated Nevada counsel is:

21 WRIGHT, FINLAY & ZAK, LLP  
22 7785 W. Sahara Ave, Suite 200  
23 Las Vegas, NV 89117  
24 (702) 475-7964; Fax (702) 946-1345  
25 rhernandez@wrightlegal.net

26 By this designation, Petitioner and undersigned party agree that this designation constitutes agreement  
27 and authorization for the designated resident admitted counsel to sign stipulations binding on all of us.

28 //./

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## APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL

The undersigned party appoints Ramir M. Hernandez, Esq. as their Designated Resident Nevada Counsel in this case.

  
Bradley Lulic  
Senior Director, Legal Compliance  
Transworld Systems Inc.

## **CONSENT OF DESIGNEE**

The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

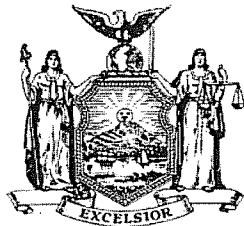
Ramir M. Hernandez, Esq.  
Nevada Bar No. 13146  
rhernandez@wrightlegal.net

## ORDER

# IT IS SO ORDERED.

Dated this 9 day of November, 2022.

Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT



*Appellate Division of the Supreme Court  
of the State of New York  
First Judicial Department*

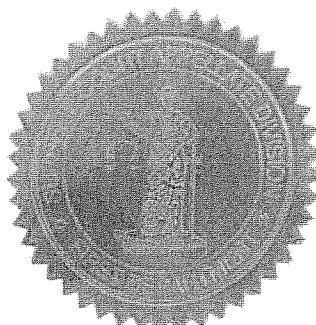
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*I, Susanna M. Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, do hereby certify that*

*R. James Jude De Rose, III*

*was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on June 7, 2004, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Administration Office of the Courts, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.*

*In Witness Whereof, I have hereunto set  
my hand in the City of New York on  
September 29, 2022.*



*Susanna M. Rojas*

*Clerk of the Court*